

Exhibit 47

November 17, 2020

138 to 141

<p style="text-align: right;">Page 138</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 Ms. Rowe?</p> <p>2 A. That we were looking for someone at a</p> <p>3 VP level scope and scale and with actual C-level</p> <p>4 executive contacts and that we would keep her in</p> <p>5 mind for future build-outs in -- in this</p> <p>6 organization focused on financial services.</p> <p>7 Q. And so does that mean that she was</p> <p>8 not considered for the role?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. To my knowledge, she didn't apply.</p> <p>11 So we just felt it's the right thing to do, to</p> <p>12 circle her back.</p> <p>13 Q. Was there -- ordinarily for an</p> <p>14 internal role like this, would someone have to</p> <p>15 fill out an applications?</p> <p>16 A. That's the way we -- we typically try</p> <p>17 to do it.</p> <p>18 Q. Did you tell Ms. Rowe that she needed</p> <p>19 to fill out an application?</p> <p>20 A. I don't recall.</p> <p>21 Q. Did you provide her with an</p> <p>22 application?</p> <p>23 A. No, that's -- everyone at Google</p> <p>24 knows about the GRO website.</p> <p>25</p>	<p style="text-align: right;">Page 140</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 A. That was the thrust of the</p> <p>2 conversation and tying back to the appropriate</p> <p>3 next steps on the search, an appropriate next step</p> <p>4 in this case was winding down the process for Ulku</p> <p>5 and keeping her in mind for future executive</p> <p>6 positions within the financial services</p> <p>7 organization.</p> <p>8 Q. What was the basis for your</p> <p>9 determination that she was not qualified for a</p> <p>10 position that was at the VP level?</p> <p>11 A. It --</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. It was largely emphasized by who</p> <p>14 ultimately the -- the candidates that we had in</p> <p>15 play and ultimately who landed in the role which</p> <p>16 is Yolanda Piazza, which as a -- as a data point</p> <p>17 was listed as one of American Bankers' most</p> <p>18 powerful women in -- in 2019, I believe.</p> <p>19 Q. At this moment when you communicated</p> <p>20 this to Ms. Rowe, what was your basis for</p> <p>21 determining that she was not qualified to be</p> <p>22 considered for a VP level role?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. That would have been largely driven</p> <p>25</p>
<p style="text-align: right;">Page 139</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 Q. Well, looking at this Exhibit 116, on</p> <p>2 February 5th, 2020 Ms. Rowe writes to you; "Hi,</p> <p>3 Stuart, great connecting again, thank you for</p> <p>4 sharing the spec. I'm interested. What would the</p> <p>5 next steps be?"</p> <p>6 And then she writes again on February</p> <p>7 10th, "Just checking in on this for next steps."</p> <p>8 Then on February 10th you write her,</p> <p>9 "We are trying to get on Kirsten's calendar so</p> <p>10 that we can determine the appropriate next steps</p> <p>11 on the search. After we connect with Kirsten,</p> <p>12 I'll circle back with you."</p> <p>13 And then on February 20th she writes,</p> <p>14 "Just checking if there are any further updates on</p> <p>15 this." You respond, "We are trying to get on</p> <p>16 Kirsten's calendar tomorrow."</p> <p>17 So at any point in that</p> <p>18 communication, did you tell her that the next step</p> <p>19 was she should fill out an application?</p> <p>20 A. No, not in this e-mail.</p> <p>21 Q. And then when you communicated to</p> <p>22 her, were you communicating to her that she was</p> <p>23 not going to be considered because you were</p> <p>24 looking for someone at the VP level in scope?</p> <p>25</p>	<p style="text-align: right;">Page 141</p> <p style="text-align: center;">- STUART VARDAMAN -</p> <p>1 by her comparison to the external candidates.</p> <p>2 Q. As of February, 2020 who were the</p> <p>3 external candidates that were being considered?</p> <p>4 A. I don't know. I'd have to look that</p> <p>5 up. Yolanda Piazza was likely involved by then.</p> <p>6 Q. Had interviews taken place at that</p> <p>7 point in time, panel interviews?</p> <p>8 A. I don't recall.</p> <p>9 Q. Did you consider the feedback with</p> <p>10 respect to Ms. Rowe in terms of determining that</p> <p>11 she was not qualified to be considered for this VP</p> <p>12 role?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. No, I didn't. Again, with the --</p> <p>15 with the financial services vertical lead role</p> <p>16 that ultimately was canceled, right, Tariq asked</p> <p>17 us to include her in process.</p> <p>18 Q. Did you consider your close-out notes</p> <p>19 in Thrive with respect to Ms. Rowe in determining</p> <p>20 that she was not qualified to be considered for</p> <p>21 the VP sales role?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. No. As I stated, I don't recall</p> <p>24 entering that -- that close-out note and I think</p> <p>25</p>

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<p style="text-align: right;">Page 142</p> <p>1 - STUART VARDAMAN -</p> <p>2 as -- as you've seen, you know, my direction as it</p> <p>3 pertains to the search will -- will come from the</p> <p>4 hiring manager that -- that I'm supporting.</p> <p>5 Q. Did you share anything with Kirsten</p> <p>6 regarding what you knew about Ms. Rowe prior to</p> <p>7 the February 27th -- I'm sorry, February 28th</p> <p>8 conversation with Ms. Rowe?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. No. It's not my role.</p> <p>11 Q. As a recruiter in your position, it's</p> <p>12 not your role to share anything about what you</p> <p>13 know about a candidate; is that your testimony?</p> <p>14 A. No, ma'am. The answer is specific to</p> <p>15 Googlers who may or may not be interested. The</p> <p>16 focus of the role on Kirsten's team was primarily</p> <p>17 an external candidate and as a result of our</p> <p>18 activities, we write the scope and scale and</p> <p>19 executive's C-level network that the candidates</p> <p>20 have.</p> <p>21 MS. GREENE: I'm sorry, Hope, could</p> <p>22 you read back that last answer.</p> <p>23 (The answer requested was read back</p> <p>24 by the reporter.)</p> <p>25 Q. Did you know what Ms. Rowe's C-level</p>	<p style="text-align: right;">Page 144</p> <p>1 - STUART VARDAMAN -</p> <p>2 Q. Do you know whether Ms. Rowe has been</p> <p>3 honored externally to Google at any point in time?</p> <p>4 A. In American Banker, no, I don't</p> <p>5 recall.</p> <p>6 Q. In any -- and by anyone, do you know</p> <p>7 whether she's received any external awards or</p> <p>8 recognitions with respect to her work?</p> <p>9 A. No, ma'am, I don't.</p> <p>10 Q. Did you do anything to ascertain what</p> <p>11 Ms. Rowe's external recognitions were?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. I don't recall, no.</p> <p>14 Q. Did you do anything at this point in</p> <p>15 time to ascertain what her qualifications were</p> <p>16 with respect to this position?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. No. The -- the primary point of that</p> <p>19 call was to let her know that we were focusing on</p> <p>20 other candidates and we'd keep her in mind for a</p> <p>21 future role.</p> <p>22 Q. Prior to the conversation though in</p> <p>23 reaching the determination that she would not be</p> <p>24 considered for this role, tell me everything you</p> <p>25 did to assess what her qualifications for the role</p>
<p style="text-align: right;">Page 143</p> <p>1 - STUART VARDAMAN -</p> <p>2 network was?</p> <p>3 A. I don't recall.</p> <p>4 Q. Do you know whether Ms. Rowe was</p> <p>5 considered or had an external reputation as an</p> <p>6 expert in this area?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. No, I don't recall.</p> <p>9 Q. Do you know whether Ms. Rowe had a</p> <p>10 reputation as an industry titan, as you referred</p> <p>11 to it?</p> <p>12 A. Compared to someone like Yolanda Pi</p> <p>13 -- Yolanda Piazza, I would say there's wide space.</p> <p>14 Q. Did you know what Ms. Rowe's</p> <p>15 reputation was externally with respect to her job?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. No.</p> <p>18 Q. Did you do anything to ascertain what</p> <p>19 her external reputation was professionally?</p> <p>20 A. No, not that I recall.</p> <p>21 MR. GAGE: Objection.</p> <p>22 Q. Did you have any basis to compare Ms.</p> <p>23 Rowe to Ms. Piazza?</p> <p>24 A. Aside from the publication as an</p> <p>25 example, I don't recall.</p>	<p style="text-align: right;">Page 145</p> <p>1 - STUART VARDAMAN -</p> <p>2 were.</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. Yeah. It was her comparison to</p> <p>5 candidates we had in play at the time, as I</p> <p>6 recall.</p> <p>7 Q. And what information did you use to</p> <p>8 make that comparison?</p> <p>9 A. Review of information with --- with</p> <p>10 Kirsten.</p> <p>11 Q. What information?</p> <p>12 A. As a matter of practice it would have</p> <p>13 included publicly-available information like a</p> <p>14 LinkedIn profile, for example.</p> <p>15 Q. Do you recall whether you reviewed</p> <p>16 her LinkedIn profile?</p> <p>17 A. Honestly, I don't.</p> <p>18 Q. Did you ask anyone else in the</p> <p>19 organization for feedback with Ms. Rowe with</p> <p>20 respect to her qualifications for the financial --</p> <p>21 for this particular position?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. No, I didn't.</p> <p>24 MS. GREENE: Okay. I would like to</p> <p>25 take a short break and then we'll come back.</p>